

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

**OFFICIAL COMMITTEE OF RETIREES LIST OF
FACT WITNESSES IN SUPPORT OF PLAN CONFIRMATION**

The Official Committee of Retirees of the City of Detroit, Michigan (the “Committee”), in accordance with the Fourth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor’s Plan of Adjustment (“Scheduling Order”), hereby provides the list of fact witnesses it may call in support of confirmation of the Plan.¹

1. Louis Bennett: Impact of the Class 12 treatment under the Plan on him and similarly situated retirees.
2. Ron Bloom: Mr. Bloom will be providing mixed fact and expert testimony on how the DWSD works and how it could be material to restoration; the terms and the basis for the Committee’s settlements.
3. Eugene Cryderman: Impact of the Class 12 treatment under the Plan on him and similarly situated retirees.

¹ This list of fact witnesses that the Committee may call in support of Plan confirmation is made without prejudice to witnesses the Committee may call in opposition of the Plan, should either or both of Classes 10 and 11 vote to reject the Plan or should the Plan be materially modified to the detriment of Holders of Claims in Classes 10, 11, or 12. In such circumstance, the Committee will file and serve its list of fact witnesses in opposition to the Plan.

4. Debra Godfrey: Impact of the Class 12 treatment under the Plan on her and similarly situated retirees.
5. Shirley V. Lightsey: Pension and OPEB rights and how they arose; impact of the Plan.
6. Dorothy O'Dell: Impact of the Class 12 treatment under the Plan on her and similarly situated surviving spouses and retirees.
7. Kevyn Orr: The Retirees' appeal of the decision in the bankruptcy eligibility hearing; the retirees' claims against the State; the City's ability to dispose of and/or monetize the DIA collection; the reasons for settling with the retirees.
8. Terri Renshaw: Pension and OPEB rights and how they arose; impact of the Plan.
9. Donald Taylor: Pension and OPEB rights and how they arose; impact of the Plan.
10. Stuart Wohl: Mr. Wohl will be providing mixed fact and expert testimony on the value of the PFRS and GRS retirees' OPEB claim; the history of OPEB rights and how they arose; impact of the Class 12 treatment under the Plan on PFRS and GRS retirees; and background of the Affordable Care Act.

The Committee reserves the right to supplement the above list of witnesses and/or topics as may be necessary to address changes and objections to the Plan.

The Committee reserves the right to identify any of the above fact witnesses as an expert witness but will do so in accordance with the expert disclosure provisions of the Scheduling Order.

The Committee reserves the right to call as a witness any fact witness identified by any other party.

Dated: June 30, 2014

Respectfully submitted,

By: /s/ Sam Alberts

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CERTIFICATE OF SERVICE

I, Sam Alberts, hereby certify that the foregoing document was filed and served via the Court's electronic case filing and noticing system on June 30, 2014.

By: /s/ Sam Alberts
Sam Alberts